Federal Defenders OF NEW YORK, INC.

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March 1, 2024

BY ECF

Hon. Lewis A. Kaplan/ Judge Jesse M. Furman (Part I) United States District Judge Southern District of New York New York, NY 10007

Re: <u>United States v. Kahron Robinson</u> 23 Cr. 665 (LAK)

Dear Judge Kaplan and Judge Furman,

Kahron Robinson, through undersigned counsel, respectfully requests a bail modification to permit him to spend Saturday, March 2, at his paternal grandmother's home located at 1687 Vyse Avenue, Apt. 3B, Bronx, NY.

Mr. Robinson was released on September 29th, 2023, on a \$50,000 Personal Recognizance Bond, that was co-signed by two financially responsible persons, with travel restricted to the Southern and Eastern districts of New York and supervision under Pre-Trial Services. His conditions were modified on October 26, 2023, to include home detention enforced by location monitoring. Mr. Robinson has previously been given permission to spend the holidays at his maternal grandmother's home. He was completely compliant with the schedule set by the Court and enforced by Pretrial.

Mr. Robinson requests permission to spend March 2 at his paternal grandmother's home. Mr. Robinson's father and brother are visiting New York City this Saturday and are unable to visit Mr. Robinson at the home that he shares with his mother. Mr. Robinson's father is visiting New York from Virginia. His brother is visiting from Buffalo, where he is a college student at the University of Buffalo. The requested modification will allow Mr. Robinson to see both family members while they are in town. I specifically request the following schedule for Mr. Robinson:

March 2: Permission to visit his paternal grandmother's home at 4:00 PM, returning to his home by 11:00 PM.

Yesterday, undersigned counsel requested the respective positions of the Pretrial Services Agency and the Government but has not yet received a response from either.

Respectfully submitted,

/s/ Zawadi Baharanyi

Zawadi Baharanyi

Assistant Federal Defenders Federal Defenders of New York

(212) 417-8735

cc: AUSA Emily Deininger

USPSO Dominique Jackson

The Clerk of Court is directed to terminate Doc. #14.

SO ORDERED:

HONORABLE JESSE M. FURMAN

United States District Judge, Part I

March 1, 2024